

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,  
GREGORY ELEFTERAKIS, ROMAN POLLAK,  
ANTHONY BRIDDA, IME COMPANIONS LLC,  
CLIENT EXAM SERVICES LLC, and IME  
MANAGEMENT & CONSULTING LLC,

Defendants.

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SAFA GELARDI and IME COMPANIONS, LLC,

Third-Party Plaintiffs,

-against-

CARLOS ROA,

Third-Party Defendant.

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CARLOS ROA,

Third-Party Counter-Claimant,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,  
and IME COMPANIONS, LLC,

Third-Party Counter-Defendants.

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**WHEREAS**, defendants/third-party plaintiffs Safa Abdulrahim Gelardi and IME Companions, LLC, filed a third-party complaint against third-party defendant Carlos Roa on March 23, 2022; and

Case No.: 1:22-cv-1032 (PKC)(JRC)

**STIPULATION AND ORDER  
OF VOLUNTARY DISMISSAL  
OF THIRD-PARTY ACTION  
AND THIRD-PARTY  
COUNTERCLAIMS**

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**WHEREAS**, third-party defendant Carlos Roa filed an answer to the third-party complaint with counterclaims against third-party counter-defendants Safa Abdulrahim Gelardi, IME Companions, LLC, and Vito Gelardi on May 5, 2022; and

**WHEREAS**, third-party plaintiffs/third-party counter-defendants Safa Abdulrahim Gelardi, IME Companions, LLC, and Vito Gelardi and third-party defendant/third-party counter-claimant Carlos Roa seek to resolve the issues alleged in the third-party complaint and third-party counterclaims and have negotiated in good faith for that purpose; and

**WHEREAS**, none of the parties hereto is an infant or incompetent person; and

**WHEREAS**, the parties hereto wish to discontinue the third-party action and third-party counterclaims;

**IT IS HEREBY STIPULATED AND AGREED**, by and between the undersigned parties and/or their respective attorneys that the third-party action is voluntarily dismissed, with prejudice, as against third-party defendant/counter-claimant Carlos Roa and that the counterclaims of third-party defendant Carlos Roa as against third-party plaintiffs/third party counter-defendants Safa Abdulrahim Gelardi, IME Companions, LLC, and Vito Gelardi are hereby dismissed, with prejudice, pursuant to Federal Rules of Civil Procedure § 41(a)(1)(A)(ii).

Dated: New York, New York

February 21, 2024

**WARNER & SCHEUERMAN**  
Attorneys for Third-Party Plaintiffs/  
Third-Party Counter-Defendants  
Safa Abdulrahim Gelardi, Vito Gelardi  
and IME Companions, LLC

By: /s/ Jonathon D. Warner  
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**ZIEHER & ASSOCIATES, P.C.**  
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Counter-Claimant  
Carlos Roa

By: /s/ Maria Zieher  
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(212) 235-7010

**SO ORDERED:**

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U.S.M.J.